

EXHIBIT A

DOS 470 (Rev. 11/01)

DEPARTMENT OF STATE
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Albany, NY 12231-0001

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State of New York - Department of State
Division of Corporations

Party Served:
GC SERVICES LIMITED PARTNERSHIP

Plaintiff/Petitioner:
FELBERBAUM, JUDA

CT CORPORATION
111 EIGHTH AVENUE 13TH FL
NEW YORK, NY 10011

Dear Sir/Madam:

Enclosed herewith is a legal document which was served upon the Secretary of State on 03/14/2016 pursuant to SECTION 121-109 OF THE REVISED LIMITED PARTNERSHIP ACT. This copy is being transmitted pursuant to such statute to the address provided for such purpose.

Very truly yours,
Division of Corporations

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

JUDA FELBERBAUM

Plaintiff,

-against-

GC SERVICES LIMITED PARTNERSHIP

Defendant.

SUMMONS

2015 009084

Index No. _____

DEC 18 2015

Veunue is designated in Orange
County based on Plaintiff's residence
in Orange County

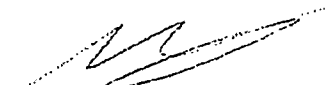
FILED
ORANGE COUNTY CLERK
2015 DEC 18 P 4:11 PM

To the Person(s) Named as Defendant(s) Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: November 23, 2015


Matthew Sarles, Esq.
Attorneys for Plaintiff
RC Law Group, PLLC
285 Passaic Street
Hackensack, NJ 07601
Phone: (201) 282-6500 Ext. 224
Fax: (201) 282-6501

Defendant's Residence Address:
6330 GULFTON ST
HOUSTON, TX 77081



SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

-----X
JUDA FELBERBAUM

Plaintiff,

Index No: _____

COMPLAINT

-v.-

GC SERVICES LIMITED PARTNERSHIP

Defendant.
-----X

Plaintiff Juda Felberbaum ("Plaintiff"), by and through his attorneys, RC Law Group, PLLC, as and for his Complaint against Defendant GC Services Limited Partnership ("Defendant"), respectfully sets forth, complains and alleges, upon information and belief, the following:

INTRODUCTION/PRELIMINARY STATEMENT

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of section 1692 *et seq.* of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

PARTIES

2. Plaintiff is a resident of the State of New York, County of Orange, residing at 14 Hamburg way, #103, Monroe, NY.

3. Defendant is a limited partnership, organized and existing under the laws of the state of Delaware, with an address at 6330 Gulfton St., Houston TX, and is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA.

FACTUAL ALLEGATIONS

4. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein with the same force and effect as if the same were set forth at length herein.

5. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").

6. The Alleged Debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

7. On or around April 15, 2015, Defendant communicated with Plaintiff concerning the Alleged Debt by telephone, leaving a message on Plaintiff's voicemail. This communication was Defendant's initial communication with Plaintiff concerning the Alleged Debt.

8. In the aforementioned voicemail message, Defendant did not disclose that it was attempting to collect a debt, and that any information obtained would be used for that purpose.

9. Additionally, Defendant did not send a written notification containing the disclosures required by 15 U.S.C. § 1692g(a), within five days after the initial communication.

10. No fewer than six days after the initial communication, Defendant sent Plaintiff a letter seeking collection of the Alleged Debt. This letter did contain a notification containing the disclosures required by 15 U.S.C. § 1692g(a).

11. The letter also contained an offer to settle the Alleged Debt for an amount lower than the full amount alleged to be owed. By its terms, the offer was to expire if the amount of the settlement was not received within fourteen days from the date of the letter.

12. The settlement offer set to expire within fourteen days of the date of the letter overshadows and is inconsistent with the rights granted in the disclosure required by 15 U.S.C. § 1692g(a). Such an expiring offer is designed to compel the consumer to forgo his statutory dispute and validation rights or face collection of a higher amount than if he had not exercised his rights.

13. As a result of Defendant's deceptive, misleading and unfair debt collection practices, Plaintiff has been damaged.

FIRST CAUSE OF ACTION
(Violations of the FDCPA)

14. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein with the same force and effect as if the same were set forth at length herein.

15. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692e, 1692e(11), 1692f, and 1692g(a)-(b).

16. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

DEMAND FOR TRIAL BY JURY


17. Plaintiff demands and hereby respectfully requests a trial by jury for all claims and issues this complaint to which Plaintiff is or may be entitled to a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment from the Defendant as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3);
- d) A declaration that the Defendant's practices violated the FDCPA; and
- e) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

Dated: Hackensack, New Jersey
November 23, 2015



RC Law Group, PLLC
By: Matthew Sarles, Esq.
285 Passaic Street
Hackensack, NJ 07601
Phone: 201.282.6500 ext. 224
Fax: 201.282.6501

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